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May 12, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Exhibit Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Exhibits 2 and 9 to Plaintiffs' Letter Motion to Expand Deposition Limit ("Plaintiffs' Letter Motion") under seal.

The sealed information in Exhibits 2 and 9 has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶ 3. Plaintiffs do not object to the characterization of these exhibits and related redacted information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Exhibits 2 and 9 to Plaintiffs' Letter Motion under seal to avoid any improper disclosure of information Defendants have designated as Confidential or Attorneys' Eyes Only. *See* ECF No. 151, at ¶ 4.b.

Respectfully submitted,

/s/ Andrew R. Dunlap

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*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 350.

Dated: May 15, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE